DISCUSSION DRAFT

Hooded Sprayer Questions for 9/24/2020 Dicamba Registrant Technical Issues Meeting

Note: EPA would appreciate publicly available references for any answers provided to the questions below.

1. How are you defining "hooded sprayer?" There is wide variety in this category of technology.
    a. EPA is unclear on how some registrants have been using the term "layby sprayer." How does a layby sprayer differ from a hooded and/or in-row sprayer?
    b. Are the companies aware of any standard definitions or standardization efforts?
2. It's EPA's understanding that hooded sprayers are currently rarely used by cotton and soybean growers.
    a. Why is this the case?
    b. What equipment availability issues would be expected for cotton and soybean growers interested in hooded sprayers if they were to become a mitigation option?
    c. What is the cost of obtaining a hooded sprayer retrofit kit?
3. EPA is uncertain about the performance of hooded sprayers and performance variations between different hooded sprayers rigs.
    a. OPP has a limited dataset on equipment efficacy. One study has been submitted to EPA.
    b. How does spray drift control performance vary between in-row and over-the-top of crop hooded spray rigs?
    c. Some rigs are homemade. How would those be accounted for?
    d. How could equipment performance standards be assured?
    e. Do the registrants have OTT data on offsite movement following use of a hooded sprayer specific to cotton or soybean that they could supply to EPA?
    f. EPA is concerned about drift when spray rig is travelling parallel to the wind. How do hooded sprayers behave in this situation?
4. How do you potentially foresee incorporating the use of a hooded sprayer onto dicamba labels?
    a. What is your proposal for operating (tractor) speed restrictions?
    b. What are your thoughts on nozzle requirements for hooded sprayers as compared to nozzle requirements on the 2018 labels?
    c. What times and/or growth stages would you apply to using a hooded spray rig? How will that align with other restrictions?
    d. What are your thoughts on wind speed limits for hooded sprayers as compared to wind speed limits on the 2018 labels?
    e. Would mitigation requirements vary between different types of equipment (*e.g.* in-row vs. over-the-top/broadcast spray equipment)?
5. EPA is uncertain about the practicality of using hooded sprayers for use on cotton and soybeans.
    a. How does the performance of a hooded sprayer in controlling drift vary by boom height as compared to field topography and/or the height of the crop being treated (*e.g.* at low spot in the field)?
    b. How does the performance of a hooded sprayer in controlling drift vary by the need to lift the sprayer at field edges in order to make turns without damaging the target crop? Please provide more details on this topic.

c. EPA is also concerned about tractor speed reductions needed to use hooded sprayers. Please comment.
d. How can accidental dripping from the hoods onto untreated areas in the field and elsewhere en route from the treated field be prevented?
e. Would you require certain equipment such as a GPS system to be used with a hooded sprayer?
f. How long does it take to install and remove a full set of hoods from a sprayer?